

Message

From: Bojan Savanovic [bojan.savanovic@us.hsbc.com]
Sent: 2/23/2022 11:38:31 PM
To: Dan Alexander [danalexander@stripe.com]
CC: Andrew Lee [lee@stripe.com]; Ana Davila [anadavila@stripe.com]; Olivia Wax Lewin [owl@stripe.com]; Jacob Chowpaknam [chowpaknam@stripe.com]; Tamer Nachaat HELMY [tamer.helmy@hsbc.ca]; Geoffrey X Nofall [geoffrey.x.nofall@hsbc.ca]; Benjamin X Palmer [benjamin.x.palmer@hsbc.ca]; Graham Carroll [graham.carroll@hsbc.ca]; Ross M Fleck [ross.m.fleck@us.hsbc.com]; Debra J LODGE [debra.j.lodge@us.hsbc.com]
Subject: RE: EXTERNAL: Re: Re: Re: HSBC + Stripe : Emergencies Act -- Ongoing operational updates
Attachments: image001.jpg; image002.png; image003.png

Hi Dan –

Apologies for the delay, I am currently flying from Dallas to our San Francisco office and have been delayed by wintry weather. I had followed up with our Canada team overnight to get crystal-clear guidance on this, as I had seen a de-escalation in the news, and wanted to ensure we had accurate information to relay to Stripe.

The Emergency Measures Order restrictions are being eased and all the subject names associated with that order no longer need to be frozen/blocked (ie. names on the Subject Parties Lists we had been providing to you over the last week). That said, the original Ontario Court Order is still in place. The list of names provided below are from the original Ontario Court Order to which Stipe confirmed the original CAD3.8m was associated with.

Based on this, we will not be releasing those funds but want to provide the direction to Stripe that ongoing subject requirements are still in place/required.

HSBC Bank Canada would like Stripe to confirm the funds still frozen by the Ontario Court Order. Would you be able to provide a breakdown of funds held for the following names in the -008 suffix account at HSBC Canada:

- The Freedom Convoy 2022 GiveSendGo campaign
- Adopt-a-Trucker GiveSendGo campaign
- Chris Garrah
- Incorporated Freedom 2022 Human Rights and Freedom Association
- Freedom 2022 Human Rights and Freedoms” (Canadian corporation number 1372685-1). and its directors, officers, employees or designates, including the following individuals:
 - o Chad Eros
 - o Miranda Gasinor
 - o Sean Tiessen
 - o Tamara Lich
 - o Chris Barber
 - o Chris Garrah
 - o Benjamin Dichter

Please let me know if you have any questions, or believe the guidance above is not sufficient to meet your needs from an operational perspective.

Thanks,

Bojan Savanovic

VP Global Relationship Manager | HSBC Bank USA

bojan.savanovic@us.hsbc.com — +1 415 341 4523 (mobile)

From: Dan Alexander <danalexander@stripe.com>

Sent: Wednesday, February 23, 2022 5:04 PM

To: Bojan Savanovic <bojan.savanovic@us.hsbc.com>

Cc: Andrew Lee <lee@stripe.com>; Ana Davila <anadavila@stripe.com>; Olivia Wax Lewin <owl@stripe.com>; Jacob Chowpaknam <chowpaknam@stripe.com>; Tamer Nachaat HELMY <tamer.helmy@hsbc.ca>; Geoffrey X Nofall <geoffrey.x.nofall@hsbc.ca>; Benjamin X Palmer <benjamin.x.palmer@hsbc.ca>; Graham Carroll <graham.carroll@hsbc.ca>

Subject: EXTERNAL: Re: Re: Re: Re: HSBC + Stripe : Emergencies Act -- Ongoing operational updates

Hi all, I assume that everyone has seen the news regarding the revocation of the Emergencies Act. We're consulting outside counsel on our end, but wanted to get a sense from this group as to how it will impact the actions we've already taken regarding frozen funds. Will there be an appeals process to get those funds released?

On Tue, Feb 22, 2022 at 4:33 PM Bojan Savanovic <bojan.savanovic@us.hsbc.com> wrote:

Thanks Andrew. Am I correct in assuming that all of these platforms use Stripe Connect for the direct disbursement of funds to campaign beneficiaries from HSBC Canada (ie. the funds do not go via the platforms themselves)?

Best,

Bojan Savanovic

VP Global Relationship Manager | HSBC Bank USA

bojan.savanovic@us.hsbc.com — +1 415 341 4523 (mobile)

From: Andrew Lee <lee@stripe.com>

Sent: Tuesday, February 22, 2022 4:04 PM

To: Bojan Savanovic <bojan.savanovic@us.hsbc.com>

Cc: Dan Alexander <danalexander@stripe.com>; Ana Davila <anadavila@stripe.com>; Olivia Wax Lewin <owl@stripe.com>; Jacob Chowpaknam <chowpaknam@stripe.com>; Tamer Nachaat HELMY <tamer.helmy@hsbc.ca>; Geoffrey X Nofall <geoffrey.x.nofall@hsbc.ca>; Benjamin X Palmer <benjamin.x.palmer@hsbc.ca>; Graham Carroll <graham.carroll@hsbc.ca>

Subject: EXTERNAL: Re: Re: Re: HSBC + Stripe : Emergencies Act -- Ongoing operational updates

Hi Bojan,

Confirming that the funds flow diagram is accurate.

In terms of other Canada crowdfunding platforms that SPCL supports: Donorbox, GoFundMe CA, Simplyk, Galabid, Crowdfunder, Facebook, GiveSendGo, Fundly, Chuffed, Betterworld.

Best,

Andrew

On Mon, Feb 21, 2022 at 2:11 PM Bojan Savanovic <bojan.savanovic@us.hsbc.com> wrote:

Hi Dan –

For your awareness, below is the link to the public announcement from the RCMP which I alluded to over the weekend, which was posted today. It makes a reference to the CAD3.8m we reported as frozen, but does not name neither Stripe nor HSBC.

“So far, this effort has culminated in the freezing of 219 financial products; the disclosure of 57 entities; the addresses of 253 Bitcoin shared with virtual currency exchangers; and, **the proactive freezing of the account of a payment processor for a value of \$3.8M by a financial institution**. We continue to work at collecting relevant information on persons, vehicles and companies, and remain in daily communication with the financial institutions to assist them.”

Link: <https://blockade.rcmp.ca/news-nouvelles/ncr-rcn211200-s-d-en.html>

Thanks,

Bojan Savanovic

VP Global Relationship Manager | HSBC Bank USA

bojan.savanovic@us.hsbc.com — +1 415 341 4523 (mobile)

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From: Bojan Savanovic
Sent: Monday, February 21, 2022 2:49 PM
To: 'Dan Alexander' <danalexander@stripe.com>
Cc: Ana Davila <anadavila@stripe.com>; Andrew Lee <lee@stripe.com>; Olivia Wax Lewin <owl@stripe.com>; Jacob Chowpaknam <chowpaknam@stripe.com>; Tamer Nachaat HELMY <tamer.helmy@hsbc.ca>; Geoffrey X Noftall <geoffrey.x.noftall@hsbc.ca>; Benjamin X Palmer <benjamin.x.palmer@hsbc.ca>; Graham Carroll <graham.carroll@hsbc.ca>
Subject: RE: EXTERNAL: Re: Re: HSBC + Stripe : Emergencies Act -- Ongoing operational updates

Hi Dan --

I appreciate the updates and great to hear the progress you're making.

I have started a conversation with our Global policy team to define clear and transparent guidelines for supportability of Stripe's crowdfunding platform users via HSBC rails globally. This is part of our wider effort to simplify your experience with HSBC, on the heels of a recent senior management collaboration workshop. To help me achieve the best outcome for Stripe, may I trouble you for a quick confirmation on the following:

1. **Crowdfunding Funds Flow** – Can you please confirm that the attached funds flow via Stripe in Canada is generally correct (*see PDF*)? Amounts are merely illustrative and obviously exclude some fees in the process. The idea is to show the general flow from A to Z.
2. **Other crowdfunding platforms at SPCL** – Besides GoFundMe and GiveSendGo, does SPCL currently provide payment processing for any other (smaller?) crowdfunding platform in Canada?

Thanks!

Bojan Savanovic
VP Global Relationship Manager | HSBC Bank USA
bojan.savanovic@us.hsbc.com — +1 415 341 4523 (*mobile*)

From: Dan Alexander <danalexander@stripe.com>
Sent: Sunday, February 20, 2022 12:44 PM
To: Geoffrey X Noftall <geoffrey.x.noftall@hsbc.ca>
Cc: Benjamin X Palmer <benjamin.x.palmer@hsbc.ca>; Ana Davila <anadavila@stripe.com>; Andrew Lee <lee@stripe.com>; Tamer Nachaat HELMY <tamer.helmy@hsbc.ca>; Graham Carroll <graham.carroll@hsbc.ca>; Jacob

Chowpaknam <chowpaknam@stripe.com>; Olivia Wax Lewin <owl@stripe.com>; Bojan Savanovic <bojan.savanovic@us.hsbc.com>

Subject: EXTERNAL: Re: Re: HSBC + Stripe : Emergencies Act -- Ongoing operational updates

Quick update, we are now directly engaged with RCMP. We'll be meeting with FINTRAC tomorrow.

On Sun, Feb 20, 2022 at 9:25 AM Dan Alexander <danalexander@stripe.com> wrote:

Acknowledged receipt of both versions 6 and 7

On Sat, Feb 19, 2022 at 7:58 PM Geoffrey X Nofall <geoffrey.x.nofall@hsbc.ca> wrote:

Hi Dan and Ana,

Attached is the most recent updated list, please advise if additional exposure is identified.

Best regards,

Geoff

Geoffrey Nofall

Head of Wholesale Compliance | HSBC Canada

Commercial and Global Banking

16th Floor, 70 York, Toronto, ON, M5J 1S9

Phone +1 416 673 6912

Mobile +1 437 343 9075
Email geoffrey.x.nofall@hsbc.ca
Website www.hsbc.ca

My HSBC profile:

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From: Benjamin X Palmer <benjamin.x.palmer@hsbc.ca>

Sent: February 19, 2022 1:02 PM

To: Dan Alexander <danalexander@stripe.com>; Ana Davila <anadavila@stripe.com>

Cc: Andrew Lee <lee@stripe.com>; Tamer Nachaat HELMY <tamer.helmy@hsbc.ca>; Geoffrey X Noftall <geoffrey.x.noftall@hsbc.ca>; Graham Carroll <graham.carroll@hsbc.ca>; Jacob Chowpaknam <chowpaknam@stripe.com>; Olivia Wax Lewin <owl@stripe.com>; Bojan Savanovic <bojan.savanovic@us.hsbc.com>

Subject: RE: EXTERNAL: Re: HSBC + Stripe : Emergencies Act -- Ongoing operational updates

Hi Dan, Ana

Attached is the most recent updated list, please advise if additional exposure is identified.

Thank you

Benjamin Palmer

AVP Compliance Advisory – Commercial & Global Banking | HSBC Bank Canada

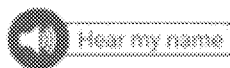
HSBC Bank Canada | Banque HSBC Canada
Suite 300 | 2001 McGill College Avenue | Montreal, Quebec | H3A 1G1

Phone 514-866-3207

Email benjamin.x.palmer@hsbc.ca

My HSBC profile:

Do you have a Compliance query? Raise it
or track it directly via [‘Ask Compliance’](#)



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From: Bojan Savanovic <bojan.savanovic@us.hsbc.com>

Sent: February 18, 2022 8:59 PM

To: Dan Alexander <danalexander@stripe.com>; Ana Davila <anadavila@stripe.com>

Cc: Andrew Lee <lee@stripe.com>; Tamer Nachaat HELMY <tamer.helmy@hsbc.ca>; Benjamin X Palmer <benjamin.x.palmer@hsbc.ca>; Geoffrey X Nofall <geoffrey.x.nofall@hsbc.ca>; Graham Carroll <graham.carroll@hsbc.ca>; Jacob Chowpaknam <chowpaknam@stripe.com>; Olivia Wax Lewin <owl@stripe.com>

Subject: RE: EXTERNAL: Re: HSBC + Stripe : Emergencies Act -- Ongoing operational updates

Hi Dan & Ana –

Attached is the v5 list we just received (number of names increased from 51 to 66).

The HSBC Canada monitoring team also spotted the below SPCL transactions for “Adopt Truk” and “Support A Trucker Convoy 2022” in the last few days, if you could please review those for compliance with the Emergencies Act.

Date	Curr	Curr	AMT	Sender Bank	Sender Account	Sender Account Name	Receiver Bank	Receiver Account	Receiver Account Name	Payer/Payee Name
2/13/2022	CAD		8.1	HSBC Bank Canada		STRIPE PAYMENTS CANADA, LTD. - STRIPE	Canadian Imperial Bank of Commerce		ADOPT TRUK	ADOPT TRUK
2/14/2022	CAD		4.55	HSBC Bank Canada		STRIPE PAYMENTS CANADA, LTD. - STRIPE	Canadian Imperial Bank of Commerce		ADOPT TRUK	ADOPT TRUK

Date	Curr	Curr	AMT	Sender Bank	Sender Account	Sender Account Name	Receiver Bank	Receiver Account	Receiver Account Name	Payer/Payee Name
2/16/2022	CAD		118.23	ATB Financial		STRIPE	HSBC Bank Canada		STRIPE PAYMENTS CANADA, LTD. - SUPPORT A TRUCKER CONVOY 2022	SUPPORT A TRUCKER CONVOY 2022
2/15/2022	CAD		111.73	ATB Financial		STRIPE	HSBC Bank Canada		STRIPE PAYMENTS CANADA, LTD. - SUPPORT A TRUCKER CONVOY 2022	SUPPORT A TRUCKER CONVOY 2022
2/14/2022	CAD		82.74	ATB Financial		STRIPE	HSBC Bank Canada		STRIPE PAYMENTS CANADA, LTD. - SUPPORT A TRUCKER CONVOY 2022	SUPPORT A TRUCKER CONVOY 2022

Thanks,

Bojan Savanovic

VP Global Relationship Manager | HSBC Bank USA

bojan.savanovic@us.hsbc.com --- +1 415 341 4523 (mobile)

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From: Bojan Savanovic

Sent: Friday, February 18, 2022 6:15 PM

To: 'Andrew Lee' <lee@stripe.com>; Tamer Nachaat HELMY <tamer.helmy@hsbc.ca>

Cc: Dan Alexander <danalexander@stripe.com>; Ana Davila <anadavila@stripe.com>; Benjamin X Palmer

<benjamin.x.palmer@hsbc.ca>; Geoffrey X Nofall <geoffrey.x.nofall@hsbc.ca>; Graham Carroll

<graham.carroll@hsbc.ca>; Jacob Chowpaknam <chowpaknam@stripe.com>; Olivia Wax Lewin <owl@stripe.com>

Subject: RE: EXTERNAL: Re: HSBC + Stripe : Emergencies Act -- Ongoing operational updates

Thank you, Andrew!

Tamer — can you please remove the hold from the -001 suffix and place it on -008?

This will then complete all currently outstanding actions (as #5 and #6 are on pause until the government reporting template is received).

Thanks,

Bojan Savanovic

VP Global Relationship Manager | HSBC Bank USA

bojan.savanovic@us.hsbc.com — +1 415 341 4523 (*mobile*)

From: Andrew Lee <lee@stripe.com>

Sent: Friday, February 18, 2022 5:39 PM

To: Bojan Savanovic <bojan.savanovic@us.hsbc.com>; Dan Alexander <danalexander@stripe.com>

Cc: Ana Davila <anadavila@stripe.com>; Benjamin X Palmer <benjamin.x.palmer@hsbc.ca>; Geoffrey X Nofall <geoffrey.x.nofall@hsbc.ca>; Graham Carroll <graham.carroll@hsbc.ca>; Jacob Chowpaknam <chowpaknam@stripe.com>; Olivia Wax Lewin <owl@stripe.com>; Tamer Nachaat HELMY <tamer.helmy@hsbc.ca>

Subject: EXTERNAL: Re: HSBC + Stripe : Emergencies Act -- Ongoing operational updates

Hi Bojan,

As a fyi we have transferred the CAD 3,788,418 to the new segregated account.

Best,

Andrew

On Fri, Feb 18, 2022 at 12:07 Dan Alexander <danalexander@stripe.com> wrote:

Thanks folks! I know in the recent past you provided a template to help with reporting obligations, can you reshare? Lost in the traffic I'm afraid.

Also, I want to confirm that we intend to make our first filing tonight.

On Fri, Feb 18, 2022 at 4:04 PM Bojan Savanovic <bojan.savanovic@us.hsbc.com> wrote:

Hi Team –

Starting a smaller thread to share operational updates over the weekend and beyond, as we shift to more of a BAU mode. Let's keep the dialogue going, even if via short/informal 'need-to-know' tidbits.

Stripe confirmations today (Fri 2/18):

- Stripe has screened against the Subject Parties Lists **v1 + v2**, and is continuing the effort
- Identified 94 true matches in Stripe accounts, with the majority of them actioned already
- Total current amount held by SPCL on behalf of subject parties: CAD 3,788,418 (as of 2/18/22)
- SPCL is now registered with FINTRAC, with follow-up meeting scheduled for Monday to walk them through Stripe controls
- Stripe last processed a transaction on 2/11/22 for the 'Adopt-A-Trucker' page on GiveSendGo; appears to be handled by another processor now (link: <https://www.givesendgo.com/warroomcanadanet>)
- Transfer of funds to segregated account will occur once process is ironed out

Latest Subject Parties Lists:

- Attached **v4** list is the latest in HSBC's possession (includes v1 + v2 + v3 names)
- **Ben Palmer** and/or **Geoff Noftall** (HSBC Canada) to provide future list updates directly via this thread (until Stripe starts receiving them directly via FINTRAC)

If there is an update that's easier and faster to share verbally, we're happy to hop on Zoom at short notice.

Have a great weekend!

Thanks,

Bojan Savanovic

VP Global Relationship Manager | HSBC Bank USA

bojan.savanovic@us.hsbc.com --- +1 415 341 4523 (mobile)

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Dan Alexander | Financial Crimes Compliance U.S. and Canada | Stripe

danalexander@stripe.com

--

Andrew Lee

lee@stripe.com

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HSBC Bank Canada, 300-885 West Georgia Street, Vancouver, BC, Canada, V6C 3E9

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Dan Alexander | Financial Crimes Compliance U.S. and Canada | Stripe

danalexander@stripe.com

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Dan Alexander | Financial Crimes Compliance U.S. and Canada | Stripe

danalexander@stripe.com

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Andrew Lee

lee@stripe.com

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Dan Alexander | Financial Crimes Compliance U.S. and Canada | Stripe

danalexander@stripe.com

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